



RJC Guidance on G7 Russian Diamond Import Restrictions

INTRODUCTION

The RJC provides this guidance for members to support them in the implementation of the G7 Russian diamond import restrictions ('import restrictions'), issued 1st March 2024.

This guidance document provides an overview of the most relevant Code of Practices (COP) provisions that members should consider when reviewing their business operations in relation to the requirements of the import restrictions. Members should also consider whether other provisions may also apply to their particular operations. Further detail on implementing these provisions is available in the [COP Guidance document](#) and the [RJC Supply Chains Guidance Document](#).

This is a live document and will be subject to change, as the G7 release further information. Please ensure you are using the latest version; updated versions will be available here on the [RJC website](#).

ISSUE BACKGROUND

On December 6, 2023, G7 leaders issued a [statement](#) which included the following:

"We will introduce import restrictions on non-industrial diamonds, mined, processed, or produced in Russia, by January 1, 2024, followed by further phased restrictions on the import of Russian diamonds processed in third countries targeting March 1, 2024.

To further the effectiveness of these measures, those G7 members who are major importers of rough diamonds will establish a robust traceability-based verification and certification mechanism for rough diamonds within the G7 by September 1, 2024, and we will continue to consult with partners, including producing and manufacturing countries on its design and implementation.

We will continue consultations among G7 members and with other partners including producing countries as well as manufacturing countries for comprehensive controls for diamonds produced and processed in third countries on measures for traceability."

SUMMARY OF IMPORT RESTRICTIONS

Import restrictions on diamonds

The import restrictions will be implemented in two key phases:

- 1st March 2024: non-industrial rough and polished diamonds of 1.0 carat or greater from Russia that are exported or processed through a third country (non-Russian country).
- 1st September 2024: non-industrial rough and polished diamonds of 0.50 carat or greater.

This first phase of the import restrictions is applicable between the 1st March - 1st September 2024.

The requirements vary across G7 nations. For the most up to date requirements, as well as country specific information, please see the links in the appendix of this document. The appendix will be updated as new guidance is released.

Import restrictions on jewellery

For the USA, self-certification, through a prescribed declaration for diamond jewellery, stating that it is not exported from Russia is now required.



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For all other G7 Nations, a ban on jewellery only applies to direct imports from Russia, effective January 1st 2024. Jewellery that has been processed in a third country, incorporating diamonds originating in Russia or exported from Russia is not in scope for March 1st 2024. Only the EU in its guidance has indicated that jewellery is expected to come into scope on September 1st 2024. No guidance has been issued yet to clarify the use of any attestation on the direct ban on imports of jewellery.

***Note:** Information regarding compliance with the prohibition on diamonds of Russian origin processed in third countries larger than or equal to 0.5 carats (0.1 grams or equivalent), taking effect from 1st September, will be communicated in due course.*

RJC MEMBER GUIDANCE

This guidance is applicable to RJC members importing and exporting non-industrial natural rough and polished diamonds into G7 countries (and including the EU). For some G7 countries this will also include jewellery containing diamonds.

Members' systems, processes and documents developed as part of their implementation of the RJC COP provisions 1, 6, 7, 12, 14 and 29 where applicable, can support meeting the requirements of the import restrictions.

Members based in G7 countries (including the EU), importing and exporting diamonds to G7 countries (including the EU)

COP 1 Legal Compliance

COP 1 requires members to have systems that support compliance with applicable law. Members should ensure they are compliant with any import restrictions, updated, new or revised legislation in the jurisdictions in which they operate. Members in G7 nations (and including the EU) trading in natural diamonds into G7 nations (and including the EU) will be subject to the import restrictions.

Compliance with COP 1 Legal Compliance is subject to verification during the member's next RJC audit under provision COP 1 Legal Compliance.

Further information for implementing COP 1 can be found on [pages 12-17 of the COP guidance document](#).

Members importing or exporting diamonds to G7 countries (including the EU)

COP 6 Human Rights

Compliance with COP 6 requires members to commit to and implement the United Nations Guiding Principles on Business and Human Rights. Members must conduct a risk assessment, and conduct (or review) their Human Rights due diligence on their supply chain, business partners, customers, and suppliers. The members risk assessment required as part of COP 6 can be used to identify if its diamonds are of Russian origin or not. The risk assessment and its outcomes are subject to verification during the member's next RJC audit of COP 6.

Further information for implementing COP 6 can be found on [pages 37-49 of the COP guidance document](#).

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COP 7 Due Diligence

Members are required to engage with their first-tier supply chain to obtain country of origin information on the materials that they are buying or trading. With the collected origin information, members must conduct due diligence risk assessments on the origin, their business partners, customers, and suppliers. Those risks are (at a minimum) to align with Annex II risks as specified by OECD, these are serious abuses associated with the extraction, transport or trade of minerals. Refer to risk mapping/guidance sources to verify the risks associated with the country of origin and its transportation routes. If the data collection raises any risks, red-flag risks or information that needs further investigation, members should suspend any further transactions until these risks have been investigated and responded to appropriately.

The due diligence processes required by COP 7 can also be used to identify if diamonds are of Russian origin or not. The due diligence process and its outcomes are subject to verification during the member's next RJC audit of COP 7.

Further information for implementing COP 7 for Diamonds can be found on [pages 50-72 of the COP guidance document](#).

COP 12 Know your Counterparty (KYC)

Members are required to hold information on all business partners, suppliers, customers or other significant stakeholders; this includes beneficial ownership. Members should consult sanctions lists for individuals, organisations, and governmental institutions throughout as much of the supply chain and business partner companies as possible. Members that import or export to G7 countries (and including the EU), must also review the G7 import restrictions when implementing COP 12. This can be incorporated into the risk assessments for Human Rights (COP 6) and supply chain due diligence (COP 7) as described above and be subject to verification during the member's next RJC audit of COP 12.

Further information for implementing COP 12 can be found on [pages 116-123 of the COP guidance document](#).

COP 14 Provenance Claims

If an RJC member makes a claim about the provenance of their diamonds whether single source or list of sources to support compliance with G7 government requirements banning Russian diamonds these are eligible as a Provenance Claim under COP 14. Members will need to ensure they have a system in place to support any such claim.

All provenance claims will be subject to verification during the member's next RJC audit of COP 14. If their next audit deadline is more than 12 months away, this shall be verified as part of a provenance claim bolt on audit as soon as reasonably practical.

For members where the G7 import restrictions are a legal requirement, claims that are covered by the legislation (e.g. stating the diamonds are not of Russian origin), are not eligible provenance claims under COP 14 as they are already audited under compliance with COP 1. However, claims stating the origin or source of the diamond (e.g. stating that diamonds are of X country origin), are eligible to be audited under COP 14 for all members.

Further information for implementing COP 14 can be found on [pages 129-134 COP guidance document](#).



COP 29.1 & 29.2 Kimberley Process Certification Scheme

Members involved in the international trade of rough diamonds shall comply with the Kimberley Process Certification Scheme (KPCS) minimum requirements and recommendations as incorporated into the applicable legislation of countries where they operate. Conformance with the KPCS means not importing or exporting rough diamonds without government-validated certificates. That is, each shipment of rough diamonds crossing an international border from one Kimberley Process participant to another must be accompanied by a uniquely numbered and government validated KPCS certificate stating origin. Any diamonds from a region or country that a duly authorised government agency has indicated is a source of conflict diamonds must have been exported in compliance with the KPCS.

The KPCS certificate is subject to verification during the member's next RJC audit of COP 29.

Further information for implementing COP 29.1 and 29.2 can be found on [pages 250-252 COP guidance document](#).

FAQ'S

Q: What should the statement claiming that the diamonds are not of Russian-origin include?

Members should review the requirements given by the relevant G7 government. The USA is the only G7 country so far to provide a statement for companies to use. Where a statement (attestation) is required, it must state clearly that the diamonds (over 1.0 carat) are not of Russian origin. Evidence may need to be provided to support this statement.

Q: What type of evidence can be provided to show that the diamonds are not of Russian-origin?

Members should review the requirements given by the relevant G7 government as to whether evidence is required, and if so what evidence is acceptable. Depending on the requirements, evidence may be requested to support the statement or attestation from suppliers claiming the diamonds are not of Russian origin. An example of evidence may include, but is not limited to, the original Kimberley Process Certificate (KPC) (single or mixed origin) issued when shipped from the diamond's origin country, an invoice, a certificate of origin issued by a chamber of commerce, a diamond origin report.

Q: Can any member of the RJC make a provenance claim about the origin of their diamonds?

If an RJC member makes a claim about the provenance of their diamonds whether single source or list of sources to support compliance with G7 government requirements banning Russian diamonds these are eligible as a Provenance Claim under COP 14. Members will need to ensure they have a system in place to support any such claim.

All provenance claims will be subject to verification during the member's next RJC audit of COP 14. If their next audit deadline is more than 12 months away, this shall be verified as part of a provenance claim bolt on audit as soon as reasonably practical.

For members where the G7 import restrictions are a legal requirement, claims that are covered by the legislation (e.g. stating the diamonds are not of Russian origin), are not eligible provenance claims under COP 14 as they are already audited under compliance with COP 1. However, claims stating the origin or source of the diamond (e.g. stating that diamonds are of X country origin), are eligible to be audited under COP 14 for all members.



Q: What is the definition of diamond origin?

The RJC defines the origin of diamonds as the mine, company, region or geographical location where the mine is located, whether an artisanal and small-scale mine or a medium or large-scale one. The origin of recycled material is the point at which it re-enters the jewellery supply chain.

Q: What countries are members of the G7?

Canada, France, Germany, Italy, Japan, the United Kingdom and the United States; additionally, the European Union (EU) is a "non-enumerated member".

Q: What are the G7 guidelines for diamonds that were purchased prior to March 1st 2024 and February 24th 2022?

While the G7 guidance regarding existing stock prior to these dates is limited, the UK has allowed for a diamond to be traded that was located outside of Russia before 1 March 2024. Traders should be able to have documented evidence demonstrating the processed diamond's location before this date. This does not need to be a precise date of manufacture, but that the goods existed and were located outside of Russia before this date.

APPENDIX OF RESOURCES

The appendix will be updated regularly as new guidance is released.

RJC resources

- [COP Guidance Document](#)
- [RJC Supply Chains Guidance Document](#)
- [December 6 2023 G7 leaders statement](#)

Country specific import restrictions

Canada

- <https://www.cbsa-asfc.gc.ca/publications/cn-ad/cn24-05-eng.html>
- <https://laws-lois.justice.gc.ca/eng/regulations/SOR-2014-58/>

European Union

- https://finance.ec.europa.eu/publications/consolidated-version_en
- https://finance.ec.europa.eu/document/download/abd6786d-526d-4e25-857b-91e2641e1c26_en?filename=faqs-sanctions-russia-diamonds_en.pdf
- [Council Regulation \(EU\) No 833/2014 \(see article 3p and Annex XXXVIII A & XXXVIII B\)](#)

Japan

- https://www.mofa.go.jp/press/release/pressite_000001_00182.html

United Kingdom

- <https://www.gov.uk/government/publications/notice-to-importers-2953-russia-import-sanctions/guidance-on-third-country-processed-russian-diamonds-measures>

United States

- <https://content.govdelivery.com/accounts/USDHSCBP/bulletins/38df6dc>



- <https://ofac.treasury.gov/faqs/added/2024-02-23#:~:text=The%20Diamond%20Jewelry%20Determination%20prohibits,exported%20from%20the%20Russian%20Federation>

Other resources

- AWDC G7 Import Guidelines:
 - <https://www.awdc.be/en/g7-import-guidelines>
 - <https://www.awdc.be/sites/awdc2016/files/documents/G7%20Import%20Guidelines%20A%20guide%20to%20Diamond%20Office%20G7%20Procedures%20UPDATE.pdf>

Disclaimer

The RJC is not responsible or liable for the interpretation or application of the above legislation or any information provided herein. This information is provided for general informational purposes only and should not be construed as legal advice. RJC members are strongly encouraged to consult with qualified legal professionals for advice specific to their circumstances and jurisdictions.

Version history

Version Number	Release date	Notes
v.1	1 March 2024	
v.1.1	20 March 2024	Clarification under COP 14. Update to country specific sanctions information and links, and other resources. Disclaimer.
v.1.2	29 March 2024	Update to links.